1	LISA KOBIALKA (SBN 191404)	QUINN EMANUEL URQUHART
	KRAMER LEVIN NAFTALIS	& SULLIVAN, LLP
2	& FRANKEL LLP	DAVID EISEMAN (SBN 114758)
ء ا	333 Twin Dolphin Drive, Suite 700	50 California Street, 22nd Floor
3	Redwood Shores, CA 94065	San Francisco, CA 94111
4	Telephone: (650) 752-1700	Telephone: (415) 875-6600
١.	Facsimile: (650) 752-1800	davideiseman@quinnemanuel.com
5	lkobialka@kramerlevin.com	JESSE BERNSTEIN (pro hac vice to be filed)
		AMY SHEHAN (pro hac vice to be filed)
6	JONATHAN M. WAGNER (pro hac vice) KERRI ANN LAW (pro hac vice)	jessebernstein@quinnemanuel.com
7	ZACHARY LEVINE (pro hac vice)	amyshehan@quinnemanuel.com
/	KRAMER LEVIN NAFTALIS &	51 Madison Avenue, 22nd Floor
8	FRANKEL LLP	New York, NY 10010
١	1177 Avenue of the Americas	Telephone: (212) 849-7000
9	New York, NY 10036	Attorneys for Defendants
	Telephone: (212) 715-9100	Alsop Louie Management LLC, Alsop Louie Capital
10	Facsimile: (212) 715-8000 jwagner@kramerlevin.com	2, L.P., Alsop Louie Partners 2 LLC
11	klaw@kramerlevin.com	2, E.1., Alsop Louie 1 drillers 2 EEC
11	zlevine@kramerlevin.com	TIMOTHY P. CRUDO (SBN 143835)
12		MARK L. HEJINIAN (SBN 281417)
	TODD A. ROBERTS (SBN. 129722)	BENJAMIN C. PULLIAM (SBN 294628)
13	MARTIN D. DIOLI (SBN. 172775)	COBLENTZ PATCH DUFFY & BASS LLP
	ROPERS MAJESKI PC	One Montgomery Street, Suite 3000
14	535 Middlefield Road, Suite 245	San Francisco, CA 94104-5500
15	Menlo Park, CA 94025	Tel.: (415) 391-4800
13	Telephone: (650) 364-8200 Facsimile: (650) 780-1701	Fax: (415) 989-1663
16	todd.roberts@ropers.com	ef-tpc@cpdb.com
	martin.dioli@ropers.com	ef-mlh@cpdb.com
17	Attorneys for Defendants Centripetal Networks,	ef-bcp@cpdb.com
18	Inc., CNI Holdings, Inc., Jonathan Rogers,	Attorneys for Plaintiff Albert Richards
10	Steven Rogers and Ocean Tomo	
19		
	IN THE UNITED STA	ATES DISTRICT COURT
20	FOR THE NORTHERN I	DISTRICT OF CALIFORNIA
21		D DIVISION
21	ALBERT RICHARDS,	Case No. 4:24-cv-01065-HSG
22	Plaintiff,	JOINT STIPULATION AND ORDER ON
	Piaintiii,	
23	v.	THE PARTIES' REQUEST TO SET A BRIEFING SCHEDULE TO RESPOND
	<b>,.</b>	TO DEFENDANTS' MOTIONS TO
24	CENTRIPETAL NETWORKS, LLC, f/k/a	DISMISS THE FIRST AMENDED
25	CENTRIPETAL NETWORKS, INC.; CNI	COMPLAINT
23	HOLDINGS, INC.; ALSOP LOUIE	COMITLAINI
26	MANAGEMENT LLC; ALSOP LOUIE	L. Civ. R 6-2, 6-2, 7-12
	CAPITAL 2, L.P.; ALSOP LOUIE PARTNERS	2. 511(0 2, 0 2, 7 12
27	2, LLC; OCEAN TOMO LLC; STEVEN ROGERS; and JONATHAN	
28	ROGERS; and JONATHAN ROGERS;	
40	Defendants.	
	1	1

CASE NO.: 4:24-cv-01065-HSG

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

All Parties, by and through their counsel, hereby submit the following stipulated request to extend the deadlines for their responses to Defendants' motions to dismiss the First Amended Complaint ("FAC").

WHEREAS, on November 6, 2024, Mr. Richards filed his FAC, ECF No. 92;

WHEREAS, on November 26, 2024, the Defendants filed three motions to dismiss the FAC, ECF Nos. 95, 96, 97;

WHEREAS, the Parties have agreed upon a January 30, 2025 motion date;

WHEREAS, the Parties have agreed to a schedule for opposition and reply briefs in response to the motions to dismiss the FAC;

WHEREAS, the Parties have agreed that Mr. Richards may file a single omnibus opposition to the three motions to dismiss not to exceed 40 pages in length;

WHEREAS, the proposed briefing schedule should not have any material effect on the schedule in this case;

NOW THEREFORE, the Parties hereby stipulate that (i) Plaintiff's omnibus opposition to Defendants' motions to dismiss shall be due January 3, 2025 and shall not exceed 40 pages in length and (ii) Defendants' replies in support of their motions to dismiss shall be due January 23, 2025.

## IT IS SO STIPULATED.

Dated: November 27, 2024	Respectfully submitted,
--------------------------	-------------------------

By: /s/ Timothy P. Crudo
TIMOTHY P. CRUDO (SBN 143835)
MARK L. HEJINIAN (SBN 281417)
BENJAMIN C. PULLIAM (SBN 294628)
COBLENTZ PATCH DUFFY & BASS LLP
One Montgomery Street, Suite 3000
San Francisco, CA 94104-5500
Tel.: (415) 391-4800
Fax: (415) 989-1663
ef-tre@cndb.com

CASE NO.: 4:24-cv-01065-HSG

Tel.: (415) 391-4800 Fax: (415) 989-1663 ef-tpc@cpdb.com ef-mlh@cpdb.com ef-bcp@cpdb.com Attorneys for Plaintiff Albert Richards

1 2 Dated: November 27, 2024 Respectfully submitted, 3 By: /s/ Jonathan M. Wagner JONATHAN M. WAGNER (pro hac vice) 4 KERRI ANN LAW (pro hac vice) ZACHARY LEVINE (pro hac vice) 5 KRAMER LEVIN NAFTALIS & FRANKEL LLP 1177 Avenue of the Americas 6 New York, NY 10036 Telephone: (212) 715-9100 7 Facsimile: (212) 715-8000 jwagner@kramerlevin.com 8 klaw@kramerlevin.com zlevine@kramerlevin.com 9 LISA KOBIALKA (SBN 191404) 10 KRAMER LEVIN NAFTALIS & FRANKEL LLP 333 Twin Dolphin Drive, Suite 700 11 Redwood Shores, CA 94065 12 Telephone: (650) 752-1700 Facsimile: (650) 752-1800 13 lkobialka@kramerlevin.com Attorneys for Defendants Centripetal Networks, Inc., 14 CNI Holdings, Inc., Jonathan Rogers, Steven Rogers 15 and Ocean Tomo 16 TODD A. ROBERTS (SBN. 129722) MARTIN D. DIOLI (SBN. 172775) 17 ROPERS MAJESKI PC 535 Middlefield Road, Suite 245 18 Menlo Park, CA 94025 Telephone: (650) 364-8200 19 Facsimile: (650) 780-1701 todd.roberts@ropers.com 20 martin.dioli@ropers.com 21 Attorneys for Defendants Centripetal Networks, Inc., CNI Holdings, Inc., Jonathan Rogers, and Steven 22 Rogers 23 24 25 26 27

28

1

2

Dated: November 27, 2024

Respectfully submitted,

3

4||

5

6

7

8

9

10

11

12

13

1415

16

17

10

18

19 20

21

22

23

24

2526

27

28

By: /s/ David Eiseman

QUINN EMANUEL URQUHART

& SULLIVAN, LLP

DAVID EISEMAN (SBN 114758)

50 California Street, 22nd Floor

San Francisco, CA 94111 Telephone: (415) 875-6600

davideiseman@quinnemanuel.com

JESSE BERNSTEIN (pro hac vice to be filed)

AMY SHEHAN (pro hac vice to be filed)

jessebernstein@quinnemanuel.com amyshehan@quinnemanuel.com 51 Madison Avenue, 22nd Floor New York, NY 10010

Telephone: (212) 849-7000 Attorneys for Defendants

Alsop Louie Management LLC, Alsop Louie Capital 2, L.P., and Alsop Louie Partners 2 LLC

CASE NO.: 4:24-cv-01065-HSG

3

## **ATTESTATION**

filing. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all other signatories to this

document have concurred in the filing of this document.

I, Timothy P. Crudo, am the ECF user whose identification and password are being used in this

/s/ Timothy P. Crudo

Timothy P. Crudo

CASE NO.: 4:24-cv-01065-HSG

The deadline for Plaintiff to file responses to Defendants' motions to dismiss the First

UNITED STATES DISTRICT JUDGE

Amended Complaint is January 3, 2025, and the deadline for Defendants to file replies in support

of their motions to dismiss the First Amended Complaint is January 23, 2025. Plaintiff may file

a single omnibus opposition to Defendants' motions to dismiss the First Amended Complaint,

1

2

## ORDER

which shall not exceed 40 pages.

Dated: 12/20/2024

PURSUANT TO STIPULATION, IT IS SO ORDERED.

3

4

56

7

8

9 10

11

1213

14

1516

17

18

19

20

2122

23

24

25

2627

28

5

CASE NO.: 4:24-cv-01065-HSG